

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

Rita Patrick,
Plaintiff,

v.

LOCAL 51, AMERICAN POSTAL
WORKERS UNION, AFL-CIO,
Shanequa Johnson-Duggins, Individually
and as President of Local 51

§
§
§

Civil Action No. 7:19-cv-10715(NSR)(PED)

§ Plaintiff's motion is denied without
§ prejudice for failure to follow my Individ.
§ Practices (see Attachment A). Default
§ Judgment is sought by Order to Show Cause
(which should be filed in accordance with ECF
Rules). Clerk of the Court requested to terminate
the motion (doc. 15). **SO ORDERED:** Dated Jan.
27, 2020

PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT
AGAINST DEFENDANT LOCAL 51, AMERICAN POSTAL WORKERS UNION
AND DEFENDANT SHANEQUA JOHNSON-DUGGINS, INDIVIDUALLY
AND AS PRESIDENT OF LOCAL 51
HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE

Plaintiff, Rita Patrick, by Irene Donna Thomas, Esq., her attorney, moves the court as follows:

1. On November 19, 2019, plaintiff brought an action against defendants, Local 51, American Postal Workers Union, AFL-CIO and Shanequa Johnson-Duggins, Individually and as President of Local 51.

2. A copy of the Summons and Complaint was served on Defendants Local 51 and Johnson-Duggins on December 6, 2019 and the Affidavits of Service are on file (See Dkt. ## 5, 6).

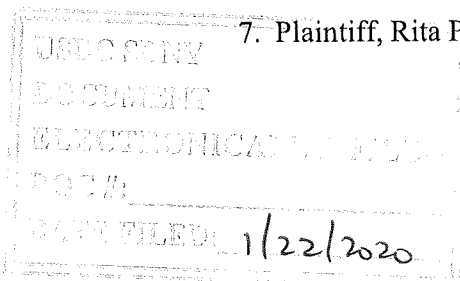
3. Defendants were required to serve an answer within 21 days, in this case, by December 27, 2019, of service of the summons and complaint.

4. Defendant Local 51 and Defendant Johnson-Duggins, has failed to file an answer to the complaint or to otherwise plead or defend against it.

5. On January 21, 2020, the Clerk entered a default against Local 51, APWU and Johnson-Duggins. (See Dkt ## 13, 14).

6. On January 21, 2020, a copy of all papers submitted to this Court in connection with this motion were mailed to Defendant Local 51 at its last known business address and Defendant Johnson-Duggins at her last known residence.

7. Plaintiff, Rita Patrick, should be immediately reinstated to her elected position as a shop



steward.

8. Plaintiff should recover damages in an amount to be determined by inquest or trial.

Dated: January 21, 2020

/s/

Irene Donna Thomas, Esq.
Attorney for Plaintiff